

The Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

JUDITH COX and CHARLES COX
individually and as Personal
Representatives of the Estates of C.J.P.
and B.T.P.,

Plaintiffs,

v.

STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL AND
HEALTH SERVICES, FOREST
JACOBSON, ROCKY STEPHENSON,
JANE WILSON, and BILLIE REED-
LYYSKI,

Defendants.

NO. 14-05923RBL

DECLARATION OF PETER J.
HELMBERGER IN SUPPORT OF
DEFENDANTS' REPLY ON
MOTION FOR SUMMARY
JUDGMENT


PETER J. HELMBERGER hereby declares under penalty of perjury under the laws of the
state of Washington that the following is true and correct:

1. I am over the age of 18, competent to testify as to the matters stated herein and
make this declaration based on my personal knowledge. I am one of the Assistant Attorneys
General assigned to represent the State of Washington in this case.

2. Attached hereto as Exhibit A is a true and correct copy of an excerpt from the
deposition of Teresa Berg, taken September 18, 2014, pages 12-13.

1 3. Attached hereto as Exhibit B is a true and correct copy of the Motion to Place
2 Children in In-Home Dependency or, in the Alternative, to Modify Placement, dated January 9,
3 2012. This motion was filed by Jeffrey Bassett, Attorney for Joshua Powell in the dependency
4 proceedings, Pierce County Cause Nos. 11-7-01802-8 and 11-7-01803-6.

5 DATED this 21st day of August, 2015 in Tacoma, Washington.

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8 PETER HELMBERGER, WSBA No. 23041
9 Assistant Attorney General
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